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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>IN RE:</b>	§	
	§	
<b>CONGRESS SAND &amp; GRAVEL, LLC, et al<sup>1</sup>.</b>	§	<b>Case No. 10-37522(SGJ)</b>
	§	
<b>DEBTORS.</b>	§	<b>Chapter 11</b>
	§	<b>(Jointly Administered)</b>

**AMENDED WITNESS AND EXHIBIT LIST OF THE DEBTORS**

**NOW COMES**, through undersigned counsel, Congress Sand & Gravel, LLC (“Congress Sand”) and Congress Materials, LLC (“Congress Materials”), the above debtors and debtors-in-possession (the “Debtors”), who file this Exhibit and Witness List in connection with the hearing on the *Motion for an Order Pursuant to Section 365(a) of the Bankruptcy Code Authorizing the Debtor to Assume Certain Leases of Nonresidential Real Property* [P-203] ( the “Motion”) pursuant to N.D. Tex. L.B.R. 9014-1(c), and identify the witnesses that they may call at the hearing on the Motion, as well as the exhibits relevant thereto, as follows:

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<sup>1</sup> The Debtors include Congress Sand & Gravel, LLC and Congress Materials, LLC (Case No. 10-37526).

### **WITNESS LIST**

1. Jay Krasoff, CEO of the Debtors;
2. Walter McNeil, General Manager of the Debtors;
3. Any and all witnesses identified by any other parties;
4. Any rebuttal witnesses, if necessary.

The Debtors additionally reserve the right to supplement this list as necessary.

### **EXHIBIT LIST**

1. The sand and gravel lease agreement (the “VCH Lease Agreement”) entered into by VCH Ranch, LP (“VCH”) and Union Materials, LP (“Union”) on or about July 18, 2006, whereby VCH did lease, let and demise unto Union certain premises located in Navarro County, Texas.

2. The assignment and assumption of lease entered into on or about June 5, 2009, between Congress Sand and Union.

3. The consent to assignment and assumption of lease executed by VCH on or about July 6, 2009, and related memorandum of lease entered into by VCH and Congress Sand.

4. The most recent version of the plan of reorganization and disclosure statement, originally filed on January 6, 2011 as P-165 and P-166, and all attachments and amendments thereto.

5. The amendment to VCH Lease Agreement executed by VCH and Congress Sand on June 27, 2011.

6. Any and all exhibits listed by any other party in their exhibit list.

Debtors additionally reserve the right to supplement this list as necessary.

**WHEREAS**, Congress Sand & Gravel, LLC and Congress Materials, LLC submit this witness and exhibit list in compliance N.D. Tex. L.B.R. 9014-1(c).

**New Orleans, Louisiana**, this 27th day of June, 2011.

Respectfully submitted,

/s/Douglas S. Draper

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